



## CITY OF BAINBRIDGE ISLAND

### Department of Public Works

August 19, 2005

WA Department of Ecology  
Water Quality Program  
PO Box 47600  
Olympia, WA 98504-7600  
ATTN: Bill Moore

Re: Comments on the May 16, 2005 Preliminary Draft of NPDES Phase II Permit

Dear Mr. Moore:

We appreciate the opportunity to provide comments and suggestions to the proposed preliminary draft Phase II permit before the official public comment period. Staff and management alike have carefully reviewed the preliminary draft and have coordinated with stormwater managers across Puget Sound as well as the Kitsap County Surface and Stormwater Management Program in generating the attached comments. The City shares many of their concerns and adds several comments specific to Bainbridge Island.

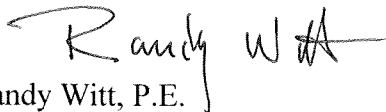
As a small municipality, our chief concern is the costs associated with this permit as drafted. Bainbridge Island is known for having a higher than average median income per household and strong support for environmental issues. However, the city receives comparatively low revenue because of the lack of a commercial and industrial taxbase. It is likely that the City may never be able to afford the full range of tasks as outlined in this preliminary permit.

Bainbridge Island is very committed to restoring and maintaining the physical, biological, and chemical integrity of our waters in accordance with the intent of the federal Clean Water Act (CWA). The City is currently developing a water quality monitoring program under a grant provided with CWA funds and has a very progressive stormwater program that is in its tenth year. In addition, our City is fortunate to have a community with a strong sense of stewardship and is actively recruiting watershed volunteers. In short, we have and are making every effort to make advances in water resource management.

Unfortunately the current preliminary draft permit is not written in the spirit of cooperation. This preliminary draft permit places the economic burden of protecting state's waters on local governments. The state (presumably through Ecology) needs to take more of this financial burden and we suggest a more unified effort between state and local governments to accomplish all of the tasks necessary to meet Phase II requirements. Absent this, we expect that even in an affluent and environmentally conscious community like Bainbridge Island, we will not meet the NPDES mandates. Conversely, we will meet many of them, perhaps more than many other small communities; this can produce a problem for delivery of the overall state NPDES program.

Attached are the city's specific comments on the draft permit. If you have questions, please call Melva Hill at (206) 780- 3724.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Witt", with a stylized flourish at the end.

Randy Witt, P.E.  
Public Works Director

c: Darlene Kordonowy  
Mary Jo Briggs  
Roger Mustain  
Lance Newkirk  
Larry Frasier  
Melva Hill  
Peter Namtvedt Best  
Jalyn Cummings  
Ross Hathaway